

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAVID LEIBOWITZ, BENJAMIN  
LEIBOWITZ, JASON LEIBOWITZ, AARON  
LEIBOWITZ, and PINCHAS GOLDSHTEIN,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW INC.,  
TETHER HOLDINGS LIMITED, TETHER  
OPERATIONS LIMITED, TETHER  
LIMITED, TETHER INTERNATIONAL  
LIMITED, DIGFINEX INC., PHILIP G.  
POTTER, GIANCARLO DEVASINI,  
LUDOVICUS JAN VAN DER VELDE,  
REGINALD FOWLER, CRYPTO CAPITAL  
CORP., and GLOBAL TRADE SOLUTIONS  
AG,

Defendants.

Case No. 1:19-cv-09236 (KPF) (SN)

**DECLARATION OF MICHAEL JASON LEE IN SUPPORT OF  
MOTION FOR ADMISSION PRO HAC VICE**

I, MICHAEL JASON LEE, being duly sworn, hereby depose and say as follows:

1. I am an attorney with the Law Offices of Michael Jason Lee, APLC, 4660 La Jolla Drive, Suite 100, San Diego, California 92122.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited in the above-captioned action.
3. I am a member in good standing of the bars of the State of California and the District of Columbia. My California Bar identification number is 206110 and a current certificate of good standing from the Supreme Court of California is attached to this Declaration as Exhibit A. My District of Columbia Bar identification number is 485722 and a current certificate of good standing from the District of Columbia Bar is attached to this Declaration as Exhibit B. I am also admitted to the United States District Courts for the Central, Eastern, Northern and Southern Districts

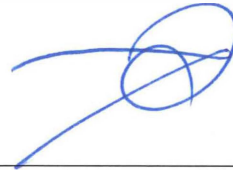
of California, the United States Court of Appeals for the Ninth and Tenth Circuits, and the Supreme Court of the United States.

4. I have never been convicted of a felony.
5. There are no pending disciplinary actions against me in any state or federal court.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore, upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 7, 2019  
San Diego, California



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Michael Jason Lee, Esq.

# **EXHIBIT A**



# Supreme Court of California

JORGE E. NAVARRETE

*Clerk and Executive Officer of the Supreme Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

**MICHAEL JASON LEE**

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that MICHAEL JASON LEE #206110, was on the 3<sup>rd</sup> day of January 2000, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 5<sup>th</sup> day of November 2019.*

JORGE E. NAVARRETE

*Clerk/Executive Officer of the Supreme Court*

By: \_\_\_\_\_

*Florentino Jimenez, Deputy Clerk*

# **EXHIBIT B**



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that

*Michael Jason Lee*

was duly qualified and admitted on May 10, 2004 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.

In Testimony Whereof,  
I have hereunto subscribed my  
name and affixed the seal of this  
Court at the City of  
Washington, D.C., on October  
31, 2019.

A handwritten signature in black ink, reading "Julio A. Castillo".

**JULIO A. CASTILLO**  
Clerk of the Court

Issued By: A handwritten signature in black ink, reading "Michael Jason Lee".  
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcbar.org.